

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED WHOLESALE MORTGAGE,  
LLC

*Plaintiff/Counter-Defendant,*

v.

AMERICA'S MONEYLINE, INC.,

*Defendant/Counter-Plaintiff.*

Case No. 22-cv-10228

Hon. Laurie J. Michelson

---

**STIPULATION TO EXTEND AMERICA'S MONEYLINE, INC.'S  
DEADLINE TO RESPOND TO UNITED WHOLESALE MORTGAGE,  
LLC'S MOTION TO DISMISS AMERICA'S MONEYLINE, INC.'S  
AMENDED COUNTERCLAIM [ECF NO. 27]**

WHEREFORE, America's Moneyline, Inc.'s ("AML"), filed its Amended Counterclaim Against United Wholesale Mortgage, LLC ("UWM") and Demand for Jury Trial (the "Amended Counterclaim") [ECF No.24] on March 8, 2023;

WHEREFORE, UWM requested a two-week extension of time to file an Answer to the Amended Counterclaim, which was consented to by AML and granted by this Court on March 13, 2023, extending the deadline for UWM's response to the Amended Counterclaim to April 5, 2023 [ECF No. 25];

WHEREFORE, UWM requested a second two-week extension of time to file a responsive pleading to the Amended Counterclaim, which was consented to by

AML and granted by this Court on March 24, 2023, extending the deadline for UWM's response to the Amended Counterclaim to April 19, 2023 [ECF No. 26];

WHEREFORE, in conjunction with AML's consent to four weeks of additional time for UWM to file its response to the Amended Counterclaim, UWM agreed that it would consent to a like extension for AML to file a response to a motion to dismiss if filed by UWM and requested/needed by AML;

WHEREFORE, on April 19, 2023, UWM filed its Motion to Dismiss AML's Amended Counterclaim (the "Motion to Dismiss") [ECF No. 27];

WHEREFORE, AML's counsel has significant other commitments during the month of May 2023, including, but not limited to: (1) court proceedings in Texas during the week of April 24 as well as briefing that is due in other cases; (2) court proceedings, a deposition and travel to daughter's college graduation during the week of May 1 as well as briefing due in other cases; (3) deposition and court proceedings in New York during the week of May 8; (4) court proceedings and a deposition during the week of May 15; (5) proceedings in Texas during the week of May 22 in connection with a court case; and (6) deposition and other commitments during the week of May 29.

WHEREFORE, in light of the foregoing, AML has requested the like extension that UWM consented to (four weeks until June 7, 2023) to file its response in opposition to UWM's Motion to Dismiss and UWM;

IT IS HEREBY STIPULATED AND AGREED by the Parties, by and through their undersigned counsel, that America's Moneyline, Inc.'s ("AML") deadline to file its response to United Wholesale Mortgage, LLC's ("UWM") Motion to Dismiss AML's Amended Counterclaim [ECF No. 27] shall be June 7, 2023, subject to approval by the Court.

**[signatures on next page]**

Respectfully submitted,

By: /s/ Mahde Y. Abdallah (w/consent)  
William E. McDonald, III (P76709)  
Roger P. Meyers (P73255)  
Mahde Y. Abdallah (P80121)  
**BUSH SEYFERTH PLLC**  
100 West Big Beaver Road, Suite 400  
Troy, MI 48084  
(248) 822-7800  
mcdonald@bsplaw.com  
meyers@bsplaw.com  
abdallah@bsplaw.com

A. Lane Morrison  
**BUSH SEYFERTH PLLC**  
5810 Wilson Road, Suite 125  
Humble, TX 77396  
(281) 930-6853  
morrison@bsplaw.com

*Attorneys for United Wholesale  
Mortgage, LLC*

Dated: May 1, 2023

By: /s/ Jeffrey B. Morganroth  
Jeffrey B. Morganroth (P41670)  
Jason R. Hirsch (P58034)  
**Morganroth & Morganroth, PLLC**  
344 N. Old Woodward Ave., Suite 200  
Birmingham, MI 48009  
(248) 864-4000  
jmorganroth@morganrothlaw.com  
jhirsch@morganrothlaw.com

Matthew D. Novello (P63269)  
**Novello & Associates, PC**  
3542 Lakeview Drive  
Highland, MI 48356  
mnovello@novellolawfirm.com

David A. Ettinger (P26537)  
**Honigman LLP**  
660 Woodward Avenue, Suite 2290  
Detroit, MI 48226  
(313) 465-7368  
DEttinger@honigman.com

*Attorneys for America's Moneyline,  
Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED WHOLESALE MORTGAGE,  
LLC

*Plaintiff/Counter-Defendant,*

v.

AMERICA'S MONEYLINE, INC.,

*Defendant/Counter-Plaintiff.*

Case No. 22-cv-10228

Hon. Laurie J. Michelson

---

**ORDER EXTENDING AMERICA'S MONEYLINE, INC.'S DEADLINE TO  
RESPOND TO UNITED WHOLESALE MORTGAGE, LLC'S MOTION TO  
DISMISS AMERICA'S MONEYLINE, INC.'S AMENDED  
COUNTERCLAIM [ECF NO. 27]**

This matter having come before the Court upon stipulation of the parties, and  
the Court being fully advised in the premises;

**IT IS HEREBY ORDERED** that America's Moneyline, Inc.'s ("AML")  
deadline to respond to United Wholesale Mortgage, LLC's Motion to Dismiss  
AML's Amended Counterclaim [ECF No. 27] shall be June 7, 2023 upon good cause  
shown.

**SO ORDERED.**

Dated: May 1, 2023

s/Laurie J. Michelson  
LAURIE J. MICHELSON  
UNITED STATES DISTRICT JUDGE